

**PALILLOLAW**  
**MICHAEL B. PALILLO P.C.**

BROADWAY CHAMBERS BUILDING

277 BROADWAY SUITE 501  
NEW YORK NEW YORK 10007

P 212.608.8959  
F 212.608-0304

June 25, 2024

MICHAEL B. PALILLO ESQ.  
Pedro Duran Esq.

mpalillo@palillolaw.com  
pduran@palillolaw.com

Office Manager  
Marianne A. Palillo  
marianne@palillolaw.com

Paralegal/Calendar  
yvazquez@palillolaw.com  
Paralegal  
Bibiana Kmecova  
paralegal@palillolaw.com

**BY ECF**

Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square Room 2203  
New York, N.Y. 10007

RE: Sango v. City of New York, et al.  
Case No.: 1:24-cv-00142-RA

Your Honor:

In furtherance of my letter motion to withdraw as Counsel for Sango, dated June 18, 2024, which was granted and So Ordered on June 20, 2024, (Document 14) we write this letter to file, under seal and in camera, the Declaration of Michael B Palillo. (Palillo declaration)

We also ask this Court excuse MBP from serving the Palillo Declaration on the other parties to this litigation or their counsel.

The Palillo Declaration sets forth a narrative of communications between Sango and MBP involving certain aspects of the attorney-client relationship that form the basis of MBP's motion to withdraw. MBP respectfully submits that submission under seal and in camera, for the Court's eyes only, is appropriate. See, e.g., *Thekke v. LaserSculpt, Inc.*, No. 11 Civ. 4426 (HB) (JLC), 2012 WL 225924, at \*3 (S.D.N.Y. Jan. 23, 2012) ("[D]ocuments in support of motions to withdraw as counsel are routinely filed under seal where necessary to preserve the confidentiality of the attorney-client relationship between a party and its counsel, and ... this method is viewed favorably by the courts.")

# PALILLOLAW

Page 2

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MBP's request to seal is designed to cover only the Palillo Declaration submitted in support of its motion to withdraw, which contains specifics about communications protected by the attorney-client privilege and work product doctrines.

The grounds for MBP's motion will be outlined in the Memorandum of Law in Support of MBP's motion which furnishes the parties with an understanding as to those grounds.

Based on the foregoing, MBP respectfully requests that the Court grant it's motion to seal.

Respectfully submitted,  
/s/  
Michael B. Palillo, Esq.

cc: Via ECF  
Adam Bevelacqua, ACC  
Special Federal Litigation Division

Consistent with Judge Abrams' Individual Rule 5(A)(iii)(b), the proposed sealed document shall be filed under seal on ECF. *See also* Rule 5(A)(iii)(d). The Court will not rule on any motion to seal without first reviewing the relevant document. SO ORDERED.



Hon. Ronnie Abrams  
U.S. District Judge  
June 26, 2024